

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION

PHARMMD SOLUTIONS, LLC,)
v.)
Plaintiff,)
DENISE KEHOE and)
PERFORMRX, LLC,)
Defendants.)

Case No.: 3-11-cv-00255

PLAINTIFF'S RENEWED APPLICATION FOR TEMPORARY RESTRAINING
ORDER AND MOTION FOR TEMPORARY INJUNCTION

Plaintiff PharmMD Solutions, LLC ("PharmMD") moves this Court for the issuance of *Temporary
Order and Motion for Temporary Injunction* *Plaintiff
Defendant
Employer
and
Persons acting in concert with
them, from retaining, disclosing, or using any of PharmMD's Work Product, Confidential
Information, and Trade Secrets¹; breaching or procuring the breach of the terms of the
Nondisclosure, Non-Competition, and Non-Solicitation provisions of the four agreements
between Defendant Kehoe and PharmMD; and/or tortiously interfering with PharmMD's
contracts and business relations. In the alternative, PharmMD requests an emergency hearing as
more fully set forth in Plaintiff's Motion for Immediate Emergency Hearing Prior to March 25,
2011 filed simultaneously herewith.*

The urgency of this request is based on irreparable harm PharmMD will suffer should
Defendant Kehoe be permitted to speak this coming weekend, March 25-28, 2011, at a

¹ For purposes of the instant action, the terms Work Product, Confidential Information, and Trade Secrets are being used as those terms are collectively defined in the four agreements signed by Defendant Kehoe, specifically Defendant Kehoe's Employment Agreement with PharmMD, PharmMD's Purchase Agreement, PharmMD's Operating Agreement, and the Non-Disclosure Agreement Defendant Kehoe signed. For example, such Work Product, Confidential Information and Trade Secrets includes but is not limited to PharmMD's core Medication Therapy Management ("MTM") services business plans, models, formulas and methodologies.